



January 22, 2004

Mr. John Flowers  
Water Efficiency Program Manager  
Office of Wastewater Management  
US EPA  
1200 Pennsylvania Ave, NW (4204M)  
Washington, DC 20460

Dear Mr. Flowers:

I found the Water Efficient Products Stakeholders meeting in Austin on January 15 very informative and thought there were good discussions in the various panel sessions. Some of the comments from utility representatives indicated a lack of understanding about current third party product certification programs. NSF International is one of the world's leading standards developers and product testing and certification agencies in the area of products related to water. As General Manager of the Water Distribution Systems program at NSF, I would be happy to present a short review of product certification programs at subsequent stakeholders meetings and explain how they could be applied to address the labeling of water efficient products.

Many water utility staff are aware of the NSF certification programs for treatment chemicals and drinking water system components. Currently 46 states require these products to comply with NSF/ANSI Standard 60: Drinking water treatment chemicals - Health Effects; and NSF/ANSI Standard 61: Drinking Water System Components - Health Effects. They may not be aware of the fact that NSF and other third party certification bodies certify a wide range of plumbing products, residential water treatment devices, and water appliances to various American National Standards. Water efficiency requirements, or additional tiers of water efficiency could easily be added to many of these standards. For many products this would require only a minor increase in the amount of testing and little or no additional cost to manufacturers. Certification marks could be adapted as in the Australian water efficiency scheme to indicate the water efficiency rating.

Using existing national standards and certification schemes for water efficient products has several advantages over starting a new national scheme like *Energy Star*. Third party certification programs are supported by manufacturers, not the water utilities. They rely on independent third party testing and evaluation of products as opposed to acceptance of manufacturer's data. The manufacturer's facilities are audited and products undergo periodic retesting to insure the products continue to meet the performance claims. While manufacturers pay for the certification, they have a choice of several certification organizations. Certification schemes are overseen by advisory groups that consist of manufacturer, regulatory and product user representatives to ensure that the schemes are operated fairly, and adequately address the needs of all stakeholders. Utilizing third party standards and certification schemes could save the U.S. government and water utilities money and time in addressing this important topic.

Thank you for the opportunity to comment. Please let me know how NSF can help to develop this important program.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Purkiss', with a stylized flourish at the end.

Dave Purkiss  
General Manager  
Water Distribution Systems  
NSF International  
Phone: 734-827-6855  
Fax: 734-827-7719  
Email: [purkiss@nsf.org](mailto:purkiss@nsf.org)